



EASTERN RESEARCH GROUP, INC.

## MEMORANDUM

TO: Rick Crume, U.S. Environmental Protection Agency (EPA),  
Office of Air Quality Planning Standards (OAQPS), (MD-13)

FROM: Susan Radomski, Eastern Research Group (ERG), Morrisville

DATE: May 19, 1998

SUBJECT: Summary of the May 7, 1998 Teleconference of the Industrial Combustion  
Coordinated Rulemaking (ICCR) Incinerator Work Group (IWG)

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### 1.0 INTRODUCTION

- The primary purpose of the meeting was to discuss the Coordinating Committee (CC) comments on the IWG presentation given at the April CC meeting. The presentation included information on the draft Regulatory Alternatives Paper (RAP), section 112 recommendations, and preliminary testing recommendations. A complete meeting agenda is included as attachment 1.
- The meeting was held on May 7, 1998 as a teleconference.
- A list of meeting attendees with their affiliations is included as attachment 2.

### 2.0 SUMMARY OF DISCUSSION AND DECISIONS

The meeting discussion generally followed the agenda. Topics of conversation are summarized in the following sections:

- 2.1 Boiler Work Group Testing Plans
- 2.2 Coordinating Committee Meeting Update
- 2.3 Miscellaneous Topics
- 2.4 Action Items

#### 2.1 Boiler Work Group Testing Plans

- The Boiler Work Group (BWG) presented an extensive test program that included both emissions and materials testing at the April CC meeting. They plan to determine the material characteristics of boiler fuels burned as waste. First, the BWG will gather available data from trade organizations and then decide if additional testing is necessary. A copy of their proposed testing program is available on the CC page of the TTN either in the April CC Meeting Minutes or the Archive area of the page.

- Norm Morrow of Exxon Chemical Americas suggested that the IWG subteams decide if they would benefit from the BWG material characterization data search and subsequent test program. If so, the subteams will decide if any materials in addition to those specified by the BWG would be useful to them and present their findings at the May IWG meeting.

## **2.2 Coordinating Committee Meeting Update**

- Norm Morrow discussed the CC request that the Source Work Groups present a complete testing recommendation at the July CC meeting so the CC may begin to prioritize testing. They also suggested that each Work Group provide an outline of the testing the Work Group would recommend if funds were more readily available and a list of the minimum tests necessary to the rulemaking. Mr. Morrow also suggested that the subteams consider whether or not they have reason to go beyond the 129 pollutant list.
- The CC offered feedback on the Regulatory Alternatives Paper (RAP) including suggestions that the IWG clarify the children's health footnote, add pollution prevention sections and address the issue of used oil.
- The CC requested EPA feedback on whether electric arc furnaces, and combustion units in the precious metals and copper industries are or will be covered under other rulemakings in response to the IWG recommendation that these Section 112 sources be referred to EPA. Rick Crume will meet with the EPA metals group and report his findings to the IWG at the May meeting.

## **2.3 Miscellaneous Topics**

- Norm Morrow discussed the fact that the FACA charter runs out in September 1998. EPA is currently deciding whether or not to renew the charter. He suggested that the IWG members consider the issue and be prepared to give their recommendations, as there may be a poll of CC and Source Work Group members.
- Beth Berglund of Merck & Co. outlined the proposal by the Pollution Prevention Subgroup to continue meeting for an additional two months. The CC agreed that the Subgroup should continue to meet until the next CC meeting.

## **2.4 Action Items**

- The subteams will review the BWG presentation outlining their material analysis program. If the program appears useful to the IWG, the subteams will decide if any materials in addition to those specified by the BWG would be useful to them and present their findings at the May IWG meeting.

- The subteams will continue working on testing recommendations for presentation at the May IWG meeting.
- Rick Crume will make revisions to the draft RAP as suggested by the CC. He will present the next draft at the May IWG meeting.

### **3.0 UPCOMING MEETINGS**

- May 27 and 28: Subteam and Work Group meetings in Durham, North Carolina.
- July 7: Work Group meeting at the Pittsburgh Airport.

**ICCR INCINERATOR WORK GROUP TELECONFERENCE**  
**May 7, 1998**

**Activities and Decisions**

- Norm Morrow of Exxon Chemical Americas outlined the Boiler Work Group plan to include material analysis as part of their testing program. The Boiler Work Group will first gather available material characterization data from trade organizations and then decide if additional testing is necessary. Mr. Morrow suggested that the Incinerator Work Group (IWG) subteams decide by the May 28 IWG meeting if they would benefit from the search and to name any additional materials that would be useful to review.
- Norm Morrow discussed the Coordinating Committee's (CC) request that the Work Groups present a complete testing recommendation at the July Coordinating Committee meeting. They also suggested that each Work Group provide an outline of the testing the Work Group would recommend if funds were more readily available and a list of the minimum tests necessary to the rulemaking. Mr. Morrow also suggested that the subteams consider whether or not they have reason to go beyond the 129 pollutant list.
- The CC offered feedback on the Regulatory Alternatives Paper (RAP), including suggestions that the IWG clarify the children's health footnote, add pollution prevention sections and address the issue of used oil.
- Norm Morrow discussed the fact that the FACA charter runs out in September 1998. EPA is currently deciding whether or not to renew the charter. He suggested that the IWG members consider the subject and be prepared to give their recommendations, because there may be a poll of CC and Source Work Group members.
- Beth Berglund of Merck & Co. outlined the proposal by the Pollution Prevention Subgroup to continue meeting for an additional two months. The CC agree that the Subgroup should continue to work until the next CC meeting.

**Upcoming Meetings**

- The current Work Group meeting schedule is as follows:

- May 27 and 28: Subteam and Work Group meetings scheduled in Durham, North Carolina.
- July 7: Incinerator Work Group meeting at the Pittsburgh airport.

#### **Action Items**

- The subteams will review the Boiler Work Group presentation outlining their material analysis program, which is available on the TTN in the Pre-Meeting Review Documents page. The subteams will decide if any materials in addition to those specified by the Boiler Work Group would be useful to them and present their findings at the May IWG meeting.
- The subteams will continue working on testing recommendations for presentation at the May IWG meeting.
- Rick Crume of EPA will make revisions to the RAP as suggested by the CC and present the next draft at the May IWG meeting.

**ATTACHMENT 1**

**FINAL AGENDA  
ICCR INCINERATOR WORK GROUP**

## **DRAFT AGENDA FOR MAY 7 IWG TELECONFERENCE (Eastern Time)**

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|----------|--|
| Noon     | Welcome, Review of Agenda, and Announcements -- Rick   |
| 12:10 pm | CC Comments on Preliminary Test Requests -- Norm   |
|          | <ol style="list-style-type: none"><li>1. Consider accomplishing pathological test objectives with fewer tests</li><li>2. Consider testing for other pollutants</li><li>3. Consider Bill O'Sullivan comment about the need for Cl-compound testing</li></ol>                      |
| 12:20 pm | Other CC Direction -- Norm   |
|          | <ol style="list-style-type: none"><li>1. ID waste material analysis needs to be incorporated into boiler test plan</li><li>2. Prioritize testing needs and identify minimum testing absolutely required (Co-chairs to prepare test request matrix for all Work Groups)</li></ol> |
| 12:30 pm | CC comments on RAP -- Rick   |
|          | <ol style="list-style-type: none"><li>1. Clarify children's health footnote</li><li>2. Add pollution prevention section(s)</li><li>3. Address used oil</li></ol>   |
| 12:35 pm | CC Comments on Section 112 Recommendation Memos -- Rick  |
|          | <ol style="list-style-type: none"><li>1. EPA feedback requested on coverage of electric arc furnaces, precious metals, and copper</li></ol>  |
| 12:40 pm | Anything Missed Above -- All   |
| 12:55 pm | Next Call/Meeting and Flash Minutes -- Norm, Rick, ERG   |
| 1:00 pm  | Adjourn -- Rick  |

**ATTACHMENT 2**

**MEETING PARTICIPANTS**



## Meeting Participants

Name	Affiliation
Ethan Begg	Missouri Department of Natural Resources
Beth Berglund	Merck & Co, Inc.
Donna Collins	U.S. EPA
Richard Crume	U.S. EPA/OAQPS
Jon Devine	U.S. EPA/OGC
David Graves	
Ruth Mahr	Citizens Concerned about Medical Waste Incineration
David Marrack	Galveston-Houston Assoc. for Smog Prevention
Dennis Marietta	La-Z-Boy Incorporated
Norman Morrow	Exxon Chemical Americas
Chris Owen	
Bill Perdue	Pulaski Furniture Corporation
Susan Radomski	Eastern Research Group, Inc.
Andrew Roth	Regional Air Pollution Control Agency (Ohio)
Chris Sarsony	Eastern Research Group, Inc.
Jeff Shumaker	International Paper
Dick Van Frank	National Audubon Society
Tom Waddell	Eastern Research Group, Inc.
Dale Walter	Industrial Equipment and Engineering Company